

ORIGINAL

October 11, 2013

VIA OVERNIGHT DELIVERY

Mr. Steve Meredith
Executive Director
Nebraska Public Service Commission
300 The Atrium
1200 N Street
Lincoln, NE 68509-4297

**Re: Pre-Filed Reply Testimony of Keith Hayes on behalf of Charter
Communications, Inc.; NUSF-77.09 & .10**

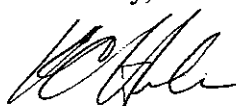
Dear Mr. Meredith:

Please find enclosed for filing in the captioned docket an original and five copies of the Pre-filed Reply Testimony of Mr. Keith Hayes on behalf of Charter Communications. An electronic version of the testimony has been served by email on the Commission Staff and on other participants in the NEBP cases as a courtesy.

Please note that Exhibit B-1 to Mr. Hayes' testimony is confidential and proprietary, and is being filed under seal subject to the Protective Order issued in NUSF 77(10). Redacted copies of Exhibit B-2 will be distributed to all persons identified on the service list.

Thank you for your assistance with this matter. Please let me know if you have any questions regarding this filing.

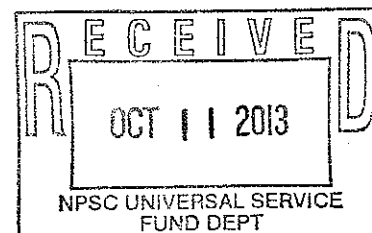
Sincerely,



K.C. Halm

cc: Service List

Encl.



**BEFORE THE
NEBRASKA PUBLIC SERVICE COMMISSION**

In the Matter of the Petition of The Nebraska Telecommunications Association for Investigation and Review of Processes and Procedures Regarding the Nebraska Universal Service Fund	Application No. NUSF-77. 09 & 10 – Application to NEBP Received from Citizens Telecommunications Company of Nebraska d/b/a Frontier Communications of Nebraska (10); and Application to NEBP Received from CenturyLink (09)
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**PRE-FILED REPLY TESTIMONY

OF

KEITH HAYES

ON BEHALF OF

CHARTER COMMUNICATIONS, INC.**

October 11, 2013

Exhibits

Exhibit A – LIST OF CENSUS BLOCKS IN AND AROUND
MILLER AND SUMNER SERVED BY CHARTER

Exhibit B-1 – **CONFIDENTIAL** MAPS SHOWING CHARTER
SERVICE AREAS IN AND AROUND TOWNS OF
MILLER AND SUMNER

Exhibit B-2 – EXCERPTS FROM NEBRASKA BROADBAND MAP
SHOWING CHARTER BROADBAND SERVICE
COVERAGE IN AND AROUND TOWNS OF MILLER
AND SUMNER

1 **I. INTRODUCTION**

2
3
4 **Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS**
5 **ADDRESS.**
6

7 A. My name is Keith Hayes. I am employed by Charter Communications, Inc.
8 ("Charter") as the Senior Vice President – Network Operations at Charter. My
9 business address is 11720 Amber Park Drive, Alpharetta GA 30009.
10

11 **Q. ARE YOU THE SAME KEITH HAYES THAT SUBMITTED DIRECT**
12 **TESTIMONY IN THIS PROCEEDING?**
13

14 A. Yes, I submitted direct testimony on September 27, 2013.
15

16 **Q. WHAT IS THE PURPOSE OF YOUR REPLY TESTIMONY?**
17

18 A. The purpose of my reply testimony is to respond to certain statements presented
19 by other witnesses that have filed direct testimony in this docket. Specifically, I
20 will respond to arguments and assertions presented by Scott Bohler, on behalf of
21 Citizens Telecommunications Company of Nebraska d/b/a Frontier ("Frontier"),
22 in support of Frontier's so-called "Project 2" involving the Miller and Sumner
23 exchanges. In addition, I will refer the Commission to my initial testimony
24 concerning CenturyLink's application for the Gering and Lexington projects as
25 my reply to the testimony of CenturyLink's witness, Ms. Ann Prockish, and as my
26 reply to the Staff's testimony recommending approval of the CenturyLink and
27 Frontier projects discussed in this testimony.
28
29

1
2 **II. THE COMMISSION SHOULD DENY FRONTIER'S APPLICATION FOR**
3 **NEBP PROGRAM SUPPORT IN AREAS SERVED BY CHARTER**
4

5 **Q. ON PAGE 2 OF THE TESTIMONY OF FRONTIER WITNESS, MR.**
6 **SCOTT BOHLER, HE DESCRIBES TWO PROJECTS. WHICH**
7 **PROJECT DOES CHARTER OPPOSE?**
8

9 A. Charter opposes what Mr. Bohler describes as "Project 2" involving the Miller
10 and Sumner exchanges, as described on page 2, lines 32 thru 39, of his testimony.

11 **Q. IS FRONTIER'S "PROJECT 2" INCLUDED IN STAFF'S TESTIMONY**
12 **AND RECOMMENDATIONS?**
13

14 A. Apparently so, although it is never identified by name in Staff's testimony. Table
15 2 of Mr. Tyler Frost's testimony on behalf of the Staff identifies approximately
16 \$219,048 of NEBP program support for Frontier's application. We believe that
17 includes money allocated for Frontier's "Project 2."

18 **Q. WHY DOES CHARTER OPPOSE FRONTIER'S "PROJECT 2"?**

19 A. Charter opposes this project for the reasons identified in its original protest filing
20 with the Commission; because Charter serves this area already with broadband
21 service at well above the speed thresholds of 4 Mbps /1 Mbps. Mr. Bohler
22 explains that Project 2 seeks funding for "additional facilities to increase the
23 transport capacity" to link the exchanges of Miller and Sumner with Frontier's
24 facilities in the Kearney exchange. However, as Mr. Bohler admits on page 3 of
25 his testimony, Charter *already provides service* to the census blocks where the
26 Miller and Sumner exchanges reside. Therefore, those areas are served by
27 Charter and are, by definition, *not* "unserved" or "underserved."
28

1 **Q. MR. BOHLER ASSERTS ON PAGE 3, LINES 46-48, OF HIS TESTIMONY**
2 **THAT CHARTER'S FACILITIES DO NOT SERVE THE RURAL AREAS**
3 **"BEYOND" MILLER AND SUMNER TOWN BOUNDARIES. WHAT IS**
4 **YOUR RESPONSE?**

5
6 **A.** Charter serves some of the rural areas surrounding Miller and Sumner. As
7 demonstrated by the confidential maps set forth in Exhibit B-1, although we may
8 not have connections to each of the homes we clearly serve homes outside of the
9 town boundaries of Miller and Sumner.

10 **Q. PLEASE IDENTIFY THE AREAS IN CENTURYLINK'S APPLICATIONS**
11 **WHERE CHARTER PROVIDES SERVICE.**

12
13 **A.** Exhibit A sets forth a list of those census blocks identified in the applications of
14 Frontier, where Charter provides broadband service, at transmission speeds well
15 above the defined standards of 4 Mbps download and 1 Mbps upload. Exhibit A
16 specifically identifies the census blocks that cover the Miller and Sumner
17 exchanges, and surrounding areas in Buffalo County and Dawson County.

18 **Q. ON PAGE 3, LINES 49-51, OF HIS TESTIMONY MR. BOHLER ADMITS**
19 **THAT CHARTER ALREADY SERVES THESE AREAS, BUT ARGUES**
20 **THAT IS NOT DETERMINATIVE. DO YOU AGREE?**

21
22 **A.** No. I think the Commission should not be in the business of picking winners and
23 losers by subsidizing competitors to build networks in areas already served by
24 companies that rely upon their own private capital and resources to build
25 broadband networks. Charter has done just that and should not be forced to
26 compete with an entity that receives subsidies to build its network. Nor should
27 the Commission use public funds to subsidize the building of a network where
28 one already exists. That would skew an otherwise level playing field, and would
29 not be competitively neutral.

1 **Q. MR. BOHLER ASSERTS ON PAGE 4, LINES 62-64, OF HIS TESTIMONY**
2 **THAT THERE IS NO WAY TO EXCLUDE CHARTER'S SERVICE**
3 **TERRITORY FROM THE APPLICATION. WHAT IS YOUR VIEW?**

4
5 A. I would note that Frontier's project does not appear to involve building any new
6 last mile connections to homes in the affected area. Instead, Frontier is proposing
7 to use this public money to build transport facilities between two points on its
8 network. To the extent that the Commission chooses to subsidize broadband
9 deployment, those subsidies should be directed to companies willing to build last
10 mile facilities and connections to homes that don't have access to broadband.
11 Funding transport facilities between two points on Frontier's network is
12 inconsistent with that goal.

13 **Q. IS THERE OTHER EVIDENCE THAT CHARTER SERVES THE AREAS**
14 **IDENTIFIED IN FRONTIER'S "PROJECT 2"?**

15
16 A. Yes, Exhibit B-2 to this testimony are print outs from the Nebraska State
17 Broadband Map showing that Charter currently provides broadband service to the
18 areas identified in Frontier's Project 2. Specifically, the maps in Exhibit B-2
19 show that Charter Communications, Inc. is identified as a provider of broadband,
20 via cable modem DOCSIS 3.0 technology, in the census block serving Miller, and
21 the rest of Buffalo County, and in the census block serving Sumner and the rest of
22 Dawson County.

23 **Q. ARE THERE OTHER REASONS THE COMMISSION SHOULD DENY**
24 **FRONTIER'S APPLICATION FOR PROJECT 2?**

25
26 A. Yes, as I noted in my initial testimony the Commission stated in Progression
27 Order No. 4 that the NEBP program "should be administered in a competitively
28 ... neutral manner." (P.O. 4 at p. 10) However, grant of Frontier's application in
29 areas served by Charter would not be competitively neutral. To the contrary,

1 grant of those applications would subsidize Frontier in areas already served by
2 Charter's network.

3 **Q. WOULD GRANT OF CENTURYLINK'S APPLICATIONS SUBSIDIZE**
4 **AN OVERBUILD OF CHARTER'S NETWORK?**

5
6 A. Yes. Charter has invested significant resources in its network to serve areas like
7 the census blocks covering the Miller and Sumner exchanges, without any
8 subsidies from the Commission or other government agencies. Private capital
9 markets are less likely to support the building of broadband networks like
10 Charter's network if they believe that government is going to subsidize
11 competitors in those areas. For that reason I believe that subsidizing Frontier will
12 send the wrong signal to private capital markets.

13
14 **III. AS EXPLAINED IN MY INITIAL TESTIMONY THE COMMISSION**
15 **SHOULD DENY ALL APPLICATIONS FOR NEBP PROGRAM**
16 **SUPPORT IN AREAS SERVED BY CHARTER**

17
18 **Q. IN YOUR INITIAL TESTIMONY YOU EXPLAINED WHY**
19 **CENTURYLINK'S APPLICATIONS IN THOSE AREAS SERVED BY**
20 **CHARTER SHOULD BE DENIED. DO YOU HAVE ANYTHING TO ADD**
21 **TO THAT TESTIMONY?**

22
23 A. No, other than to incorporate those points into this reply testimony as Charter's
24 response to the testimony of Ann Prockish in support CenturyLink's applications.
25 As I explained in my initial testimony because Charter serves the areas of Gering
26 and Lexington the Commission should deny CenturyLink's application. Grant of
27 those applications would not be competitively neutral; would subsidize
28 overbuilding of networks financed with private capital; and, would not be good
29 public policy.

1 **IV. RECOMMENDATION**

2 **Q. WHAT IS YOUR RECOMMENDATION WITH RESPECT TO THE**
3 **COMMISSION'S CONSIDERATION OF FRONTIER'S APPLICATION**
4 **FOR "PROJECT 2"?**

5
6 A. The Staff's recommendation in support of Frontier's application for subsidies in
7 areas already served by Charter conflicts with the Commission's stated priority of
8 targeting unserved or underserved areas. Directing NEBP support to providers
9 proposing to serve areas already served by Charter would conflict with the
10 Commission's goals of competitive neutrality, and undermine Charter's
11 significant network investments (supported by private capital) in these areas. For
12 these reasons the Commission should deny Frontier's application for "Project 2,"
13 and CenturyLink's Gering Application and Lexington Application.

14 **IV. CONCLUSION**

15 **Q. DOES THIS CONCLUDE YOUR REPLY TESTIMONY?**

16 A. Yes.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Pre-filed Reply Testimony of Keith Hayes, filed in Application No. NUSF-77, was provided to the following person this 11th day of October, 2013, by electronic mail and first class mail.

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Gina Lee

Exhibit A

**Charter Communications,
Pre-Filed Reply Testimony of Keith Hayes
NUSF-77**

**LIST OF CENSUS BLOCKS IN AND AROUND
MILLER AND SUMNER SERVED BY CHARTER**

PROVIDER NAME	CENSUS BLOCK ID	CITY	MAXIMUM ADVERTISED SPEED
CHARTER COMMUNICATIONS INC.	310199689001132	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001139	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001140	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001141	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001142	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001153	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001154	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001155	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001156	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001157	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001158	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001159	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001160	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001161	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001162	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001163	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001164	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001165	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001166	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001167	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001168	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001169	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001170	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001171	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001172	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001173	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001177	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001178	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001179	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001180	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001254	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001255	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001256	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001257	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001258	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001259	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001260	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001262	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001263	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001264	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001265	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001267	MILLER	100 MBPS

PROVIDER NAME	CENSUS BLOCK ID	CITY	MAXIMUM ADVERTISED SPEED
CHARTER COMMUNICATIONS INC.	310199689001268	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310199689001269	MILLER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001172	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001173	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001200	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001201	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001207	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001208	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001209	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001210	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001211	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001218	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001219	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001220	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001221	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001222	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001223	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001224	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001225	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001226	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001227	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001228	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001229	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001230	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001231	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001232	SUMNER	100 MBPS
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CHARTER COMMUNICATIONS INC.	310479680001246	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001247	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001252	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001280	SUMNER	100 MBPS

PROVIDER NAME	CENSUS BLOCK ID	CITY	MAXIMUM ADVERTISED SPEED
CHARTER COMMUNICATIONS INC.	310479680001281	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001282	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001283	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001284	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001285	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001286	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001287	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001288	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001289	SUMNER	100 MBPS
CHARTER COMMUNICATIONS INC.	310479680001290	SUMNER	100 MBPS

Exhibit B-1

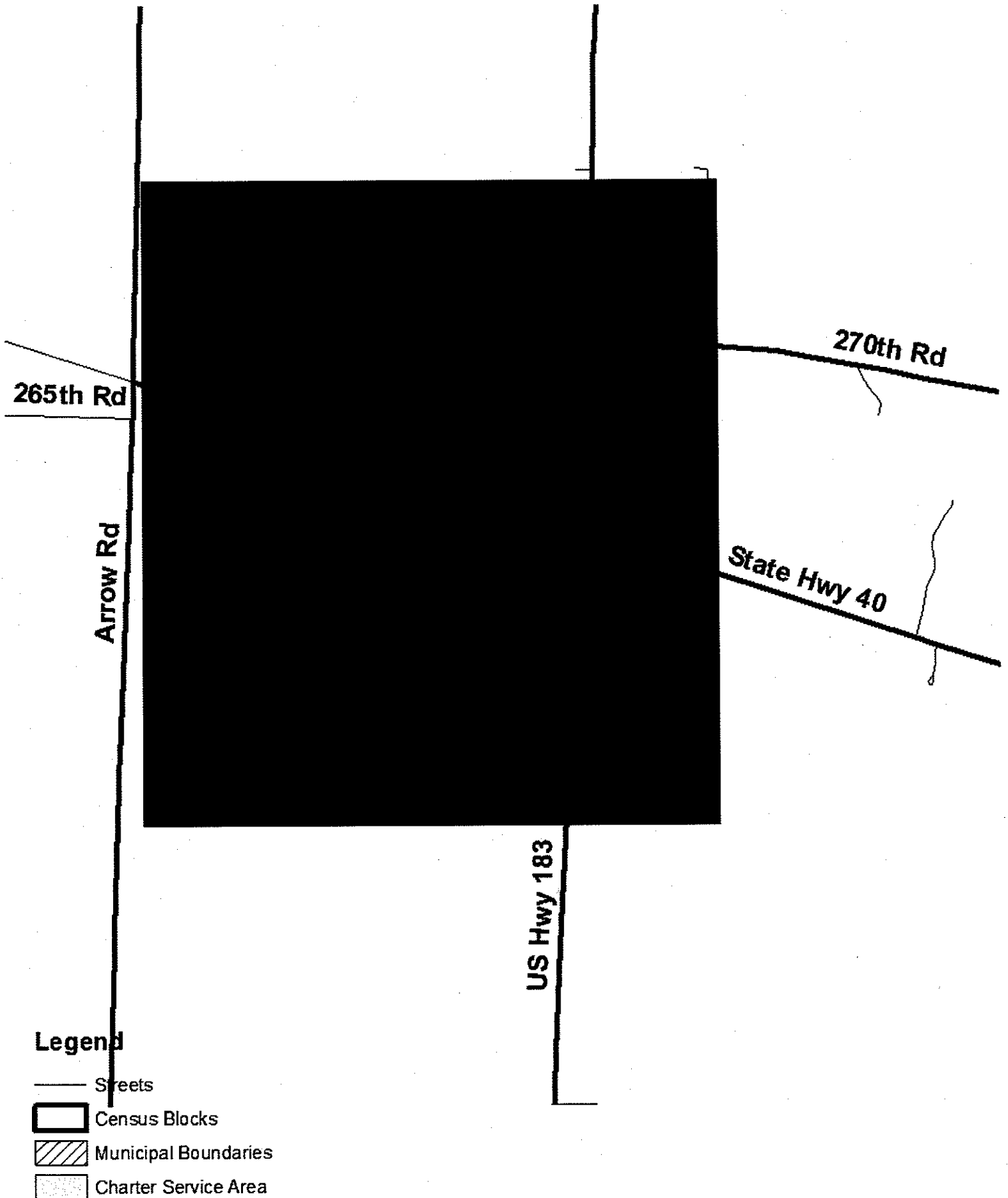
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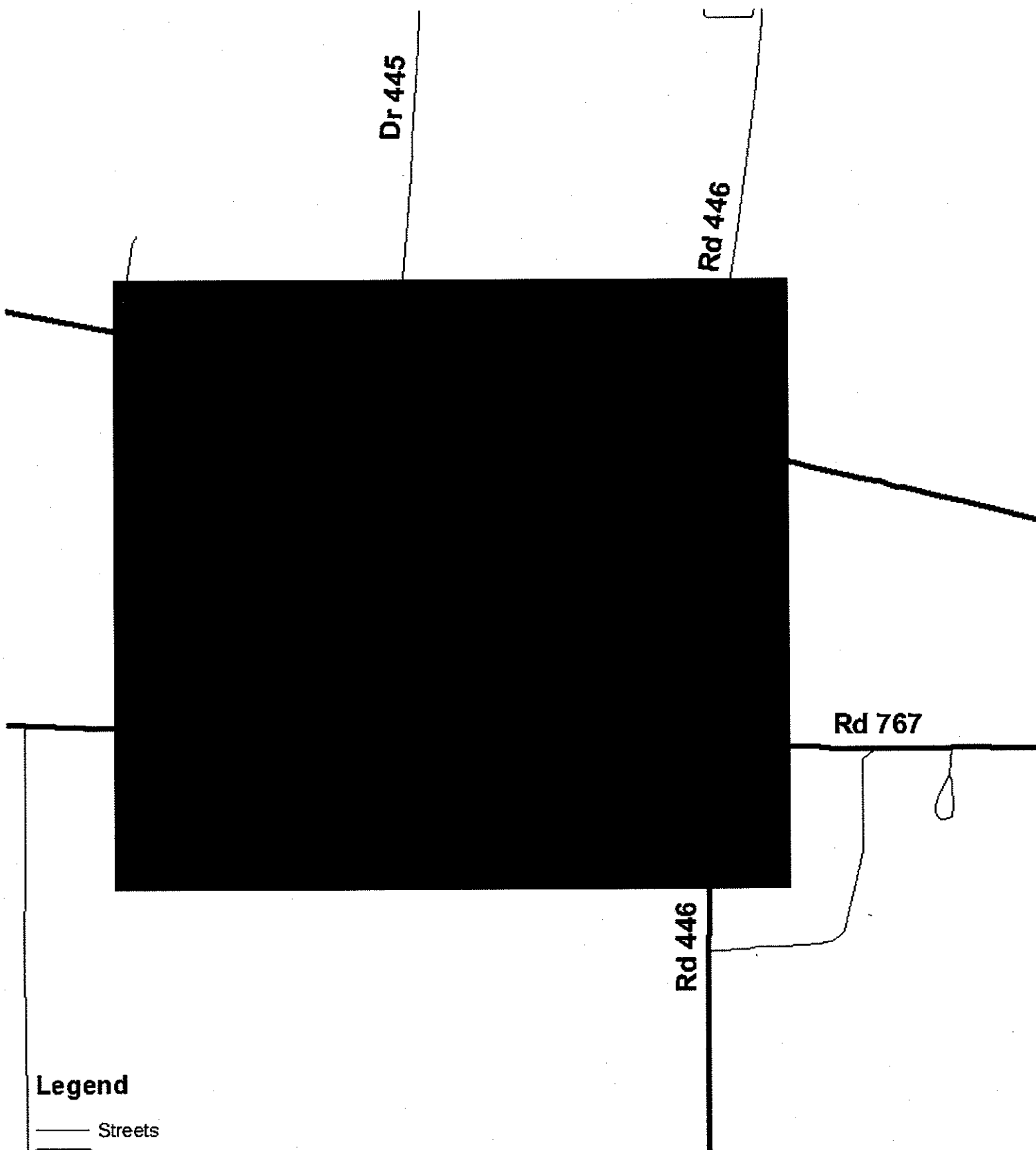
PUBLIC VERSION

REDACTED

MILLER NEBRASKA CHARTER SERVICE AREA



SUMNER NEBRASKA CHARTER SERVICE AREA



Legend

- Streets
- Census Blocks
- Municipal Boundaries
- Charter Service Area